

# EXHIBIT 13

## [Filed Under Seal]

Videotaped Deposition of  
**William Dalius**  
February 26, 2020

Grae  
vs.  
Corrections Corporation of America, et al.  
**Confidential**



<p style="text-align: right;">Page 89</p> <p>1 A No, that was a totally different 2 appropriation. 3 <b>Q You can go ahead and put that aside.</b> 4 <b>Did you ever provide any analysis to</b> 5 <b>lobbyists on behalf of CCA?</b> 6 A Can you give me a specific example of 7 what -- 8 <b>Q Sure.</b> 9 <b>I mean, I guess generally what I'm asking</b> 10 <b>is, did you perform work for CCA that was intended</b> 11 <b>to be provided to lobbyists?</b> 12 A I provided data to our office in 13 Washington, D.C. that I assume worked with 14 lobbyists. 15 <b>Q And what kind of data did you provide them?</b> 16 A It would -- typically, it would have been 17 financial data, similar to that, and -- and -- and 18 overviews of the BOP budget process so they 19 understood the budget process. 20 <b>Q Do you know who Stacia or Stacia Hylton is?</b> 21 A I do. 22 <b>Q And who is she?</b> 23 A She's currently on our board of directors, 24 but she was also the previous director of the 25 Marshals Service.</p>	<p style="text-align: right;">Page 91</p> <p>1 <b>at CCA or still doing analyst work. It appears,</b> 2 <b>based on the context of the e-mail, that you are</b> 3 <b>actually employed at this time.</b> 4 A Where it says I'm in temporary quarters 5 would indicate I was full-time. 6 <b>Q And so you don't have any reason to believe</b> 7 <b>you didn't receive this e-mail while employed at</b> 8 <b>CCA?</b> 9 A Correct. 10 <b>Q Do you see here -- and I believe this is</b> 11 <b>consistent with what you testified earlier -- that</b> 12 <b>you indicated that you didn't have any specific</b> 13 <b>numbers in my old job, but you didn't bring them</b> 14 <b>with you?</b> 15 A Repeat that question, please. 16 <b>Q Sure.</b> 17 <b>So there's a reference here to some analysis</b> 18 <b>that you've done with lobbyists in D.C.</b> 19 A Okay. 20 <b>Q Do you see that?</b> 21 A Yeah. In the first sentence, yes. 22 <b>Q Does that refresh your recollection of</b> 23 <b>whether you did work for lobbyists on behalf of CCA?</b> 24 A As I told you earlier, I did meet with our 25 D.C. office that works with our lobbyists.</p>
<p style="text-align: right;">Page 90</p> <p>1 <b>Q And did you have the opportunity to work</b> 2 <b>with her while you were at CCA or providing</b> 3 <b>consulting services for CCA?</b> 4 A To work with Stacia? 5 <b>Q Yes.</b> 6 A A little bit. 7 <b>Q And in what subject matters did you work</b> 8 <b>with her?</b> 9 A I don't recall specifically, but I'm 10 guessing if we worked on anything together, it would 11 have been financial related since that's my primary 12 expertise, as well as prisoner operations. 13 MS. RADCLIFFE: I'm going to mark as 14 Exhibit 325... 15 (Marked Exhibit No. 325.) 16 BY MS. RADCLIFFE: 17 <b>Q Mr. Dalius, do you see that this appears to</b> 18 <b>be an e-mail sent to you from Stacia Hylton to</b> 19 <b>yourself on August 20th, 2016?</b> 20 A Yes, ma'am. 21 <b>Q Do you have any reason to believe that you</b> 22 <b>did not receive this e-mail?</b> 23 A No, ma'am. 24 <b>Q And at this time, it's not clear to me in</b> 25 <b>August 20th, 2016, whether you are actually employed</b></p>	<p style="text-align: right;">Page 92</p> <p>1 <b>Q And would that have been Mr. Wiley?</b> 2 A Jeremy Wiley, correct. 3 <b>Q How often did you meet with him?</b> 4 A No more than a couple times. 5 <b>Q And when did you first meet with him?</b> 6 A I think the first time -- again, I may be 7 off on the date. But it would have been probably 8 January of 2016. 9 <b>Q And I believe you testified that you had</b> 10 <b>provided by -- financial data; is that accurate?</b> 11 A Yes, ma'am. 12 <b>Q Okay.</b> 13 A It would have been similar data that 14 would -- that we just went over. 15 <b>Q Do you recall what the purpose was intended</b> 16 <b>for the use of that data?</b> 17 A I don't know what they wanted it for. 18 <b>Q Do you recall the nature of the data that</b> 19 <b>you provided?</b> 20 A Other than financial based -- I was the CFO, 21 so they were looking for financial information. 22 <b>Q There's a reference to her e-mail below, and</b> 23 <b>it says, I like -- you had specific numbers in my</b> 24 <b>old job but didn't bring any of it with me.</b> 25 <b>Would that be consistent with your testimony</b></p>

<p style="text-align: right;">Page 93</p> <p>1 earlier that you didn't bring any specific data from</p> <p>2 the BOP with you once you left?</p> <p>3 A That was my goal.</p> <p>4 Q And do you recall discussing with Ms. Hylton</p> <p>5 cost comparison for a hypothetical or simulated</p> <p>6 facility?</p> <p>7 A I remember generally speaking cost data with</p> <p>8 her, not specifics.</p> <p>9 Q Do you have any reason -- let me restate</p> <p>10 that.</p> <p>11 You didn't actually perform the analysis,</p> <p>12 did you --</p> <p>13 MR. McGEE: Object to form of the</p> <p>14 question as vague.</p> <p>15 BY MS. RADCLIFFE:</p> <p>16 Q -- regarding --</p> <p>17 A I don't recall doing an analysis.</p> <p>18 Q And do you recall seeing any analysis done</p> <p>19 with respect to a cost comparison between BOP and</p> <p>20 CCA for a simulated facility?</p> <p>21 A I don't recall that.</p> <p>22 Q You can go ahead and put that one aside.</p> <p>23 MS. RADCLIFFE: I'll mark the next one</p> <p>24 326.</p> <p>25 (Marked Exhibit No. 326.)</p>	<p style="text-align: right;">Page 95</p> <p>1 Q Do you recall discussions with Mr. Vanyur</p> <p>2 regarding building this model and your capabilities?</p> <p>3 A No, ma'am.</p> <p>4 Q As you sit here today, do you believe you</p> <p>5 have the capabilities to build such a model?</p> <p>6 A A model like this?</p> <p>7 Q Yes.</p> <p>8 A Depends on what the specifics were for the</p> <p>9 model.</p> <p>10 Q Okay.</p> <p>11 A I don't know the exact specifics of the</p> <p>12 model. I've got the abilities to build what I knew</p> <p>13 in the BOP.</p> <p>14 Q But you didn't actually perform any analysis</p> <p>15 with respect to modeling the cost comparisons</p> <p>16 between the BOP and CCA other than the per diem</p> <p>17 rate?</p> <p>18 A Other than what I do with -- for the Bureau</p> <p>19 of Prisons.</p> <p>20 Q So do you believe you have the capabilities</p> <p>21 to prepare a simulated facility model that was</p> <p>22 discussed in the prior exhibit?</p> <p>23 MR. McGEE: Object to the form of the</p> <p>24 question as vague.</p> <p>25 THE WITNESS: Again, I would have to</p>
<p style="text-align: right;">Page 94</p> <p>1 BY MS. RADCLIFFE:</p> <p>2 Q So, Mr. Dalius, do you see here that you</p> <p>3 received an e-mail from Ms. Hylton on</p> <p>4 approximately -- on August 21st, 2016?</p> <p>5 A Yes, ma'am.</p> <p>6 Q Do you have any reason to believe that you</p> <p>7 did not receive this e-mail while employed at CCA?</p> <p>8 A No, ma'am.</p> <p>9 Q Do you see here a reference in -- to</p> <p>10 Mr. Vanyur?</p> <p>11 A Yes, ma'am.</p> <p>12 Q He's also on the e-mail chain, correct?</p> <p>13 A Yes.</p> <p>14 Q And do you recall discussions with</p> <p>15 Ms. Hylton or Mr. Vanyur regarding cost comparison?</p> <p>16 A I don't remember specifically, but</p> <p>17 generally, yes.</p> <p>18 Q Do you see here that Mr. Vanyur indicates</p> <p>19 that the model being discussed was beyond his and</p> <p>20 your capabilities?</p> <p>21 A Where does it say that?</p> <p>22 Q Sure. It's in the e-mail from Mr. Vanyur,</p> <p>23 which is the second e-mail down. You can go ahead</p> <p>24 and go -- read it if you want.</p> <p>25 A Yeah, I see that.</p>	<p style="text-align: right;">Page 96</p> <p>1 see the specific requirements as to whether or not I</p> <p>2 could do it or not.</p> <p>3 BY MS. RADCLIFFE:</p> <p>4 Q So without knowing what the specific</p> <p>5 criteria were for the model, you wouldn't know one</p> <p>6 way or another whether you had the capabilities?</p> <p>7 A That's correct.</p> <p>8 Q Fair enough.</p> <p>9 Do you recall that while you were consulting</p> <p>10 with CCA or were employed there that CCA monitored</p> <p>11 the private prison inmate populations?</p> <p>12 MR. McGEE: Object to the form of the</p> <p>13 question. It's vague.</p> <p>14 THE WITNESS: Yeah.</p> <p>15 Can you give me more specifics as to --</p> <p>16 BY MS. RADCLIFFE:</p> <p>17 Q Sure.</p> <p>18 Do you recall whether or not the -- CCA</p> <p>19 prepared reports that tracked the numbers of</p> <p>20 prison -- private prison inmate populations at CCA</p> <p>21 and its competitors?</p> <p>22 A Certainly we do at CCA. I'm not sure about</p> <p>23 the competitors.</p> <p>24 Q And in those reports, does CCA track the</p> <p>25 inmate population not only at CCA but at, for</p>